



Privacy notice

EU General Data Protection Regulation (2016/679), Articles 13 and 14

Privacy notice for public employment services

Joint data controllers

City of Helsinki/Board of Employment Services Enterprise.

Employment, Development and Administration Centre (KEHA Centre).

This notice pertains to the processing of personal data by the City of Helsinki.

In accordance with section 6 of the decision by the Employment Services Enterprise on the responsibilities and tasks of the data controller (2 January 2025), the person in charge of the register is the Managing Director.

Why do we process your personal data?

We need to process your personal data in order to provide you with public employment services. The payment of unemployment benefits also requires the processing of your data, as employment service providers have duties pertaining to unemployment benefits.

In accordance with section 112, subsection 1 of the Act on the Organisation of Employment Services, data on clients and the providers of employment services can be used for:

1) organising and carrying out the services and duties specified in the Act on the Organisation of Employment Services;

2) carrying out the duties of employment authorities or the Employment, Administration and Development Centre specified in the Act on the Promotion of Immigrant Integration, the Unemployment Security Act, the Act on a General Social Security Benefit, the Act on Rehabilitative Work and the Act on Vocational Education and Training and carrying out the duties of the Employment, Administration and Development Centre related to international recruitment services specified in the Act on the Economic Development Centres and the Employment, Administration and Development Centre (531/2025) and providing guidance related to employment services and unemployment security;

3) supervising, developing, monitoring, statistical reporting, forecasting and guidance related to the aforementioned duties.

According to section 12, subsection 1 of the Act on the Multisectoral Promotion of Employment, employment authorities may process data pertaining to an unemployed person for the purpose of carrying out the duties specified in said Act and related to the multisectoral joint operating model and the supervising, developing, monitoring, evaluation, statistical reporting, forecasting and guidance related to these duties.

We may also process your personal data for the purpose of creating and publishing a job applicant profile, provided that the conditions set out in chapter 14 of the Act on the Organisation of Employment Services are met. The data contained in job applicant profiles are used to promote employment and the functioning of the labour market, and for statistical purposes.

Legal basis for the processing

- Article 6(1)(a) of the EU General Data Protection Regulation: the data subject has consented to the processing of their personal data for one or more specific purposes. The consent is used in a manner supplementing the statutory processing of personal data in situations in which there is no statutory basis. Consent is requested e.g. when data are disclosed to the provider of a service supporting employment without the service having been agreed upon in the employment plan or another corresponding plan. In such a case, the data necessary for the organisation of the service are disclosed

to the service provider. Consent is also requested in situations pursuant to section 118 of the Act on the Organisation of Employment Services when data necessary for filling a job vacancy are disclosed to an employer.

- Article 6(1)(c) of the EU General Data Protection Regulation: processing is necessary for compliance with a legal obligation to which the data controller is subject. All the data pertaining to a personal client mentioned below in section 'What personal data concerning you do we process?' may be processed on this basis.
- Phone conversations between personal clients and the advisory service are recorded based on Article 6(1)(e) of the EU General Data Protection Regulation: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.

Key legislation

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Act on the Organisation of Employment Services (380/2023)
- Unemployment Security Act (1290/2002)
- Act on the Promotion of Immigrant Integration (681/2023)
- Act on Rehabilitative Work (189/2001)
- Act on the Multisectoral Promotion of Employment (381/2023)
- Act on the Application of European Union Legislation Concerning the Coordination of Social Security Systems (352/2010)

What personal data concerning you do we process?

In accordance with section 114, subsection 1 of the Act on the Organisation of Employment Services, we may process the following data on personal clients:

1) personal identity code;

2) name and contact details;

- 3) information on the client relationship with Employment Services, accessing the services of the employment authority or the Development and Administration Centre and any special arrangements required for accessing the services;
- 4) information on education and training, employment history and vocational skills and other data used in employment services;
- 5) information on service needs, plans and implementation of plans;
- 6) information on employment and training offers and presentations to potential employers;
- 7) information on public employment services, employment promotion services as specified in the Unemployment Security Act, other services supporting job seeking and employment and expert assessment;
- 8) any such information on and assessments of health, work capacity and functional ability that has an impact on the person's potential employment and is necessary for providing the person with services;
- 9) statements related to unemployment security, labour policy statements and other statements and notifications; this information and information required for issuing a labour policy statement or other statement may also be processed if the natural person is not a personal client;
- 10) information on benefits covered by public employment services.

We may also process other data on private clients besides the data listed above if they are necessary for the purposes of creating or publishing a job applicant profile or for monitoring the use of the service platform.

We may process identifying information on representatives of

employers or businesses applying for or receiving public employment services.

We may process identifying information on representatives of providers of employment services.

The following information may be processed for the purposes specified in section 11, subsection 1 of the Act on the Multisectoral Promotion of Employment in accordance with section 11, subsection 2 of the Act:

- 1) name, personal identity code and contact details;
- 2) information related to the client relationship in accordance with the multisectoral joint operating model, accessing the services and any special arrangements required to access the services;
- 3) information on education and training, employment history and vocational skills;
- 4) any information on the person's social situation that has an impact on the person's potential employment and is necessary for providing the services;
- 5) any such information and assessments pertaining to health and work and functional ability that have an impact on the person's potential employment and are necessary for providing the person with services;
- 6) information on service needs that has an impact on the person's potential employment;
- 7) information on the multisectoral employment plan and its realisation, monitoring and adjustments.

Additionally, phone conversations between a personal client and the advisory service are recorded in order to verify the use of phone services and improve the quality of the services.

How do we collect personal data?

We collect personal data directly from the data subjects and in various service situations, e.g. when personal clients access the online services or contact us by telephone, via secure email and in person.

We may also receive personal data through disclosures from a personal register of another employment authority, other municipal authority, a government authority, a wellbeing services county, the Social Insurance Institution of Finland, an unemployment fund, the Finnish Centre for Pensions, the Employment Fund, a provider of employment services, other provider of employment support services arranged by the employment authority as specified in the employment plan or another corresponding plan and an organiser of a work try-out (section 115, subsection 1 of the Act on the Organisation of Employment Services).

In addition to the above, employment authorities have the right to receive, in order to investigate the grounds for granting employment subsidy for people over 55 and pay subsidy, as specified in chapter 10 of the Act on the Organisation of Employment Services, information on any solutions as specified in section 83, subsection 3, paragraph 4 of the Act on the Organisation of Employment Services (section 115, subsection 2 of the Act on the Organisation of Employment Services) from the fine register, as specified in section 46 of the Act on the Enforcement of a Fine (672/2002).

We also receive information related to job offers and personal recruitment solutions from employers.

To whom do we disclose your personal data?

We may disclose to employers information that is necessary for filling a job vacancy only with the jobseeker's written consent. The information necessary for filling a job vacancy is listed in section 118, subsection 1 of

the Act on the Organisation of Employment Services, according to which the information necessary for filling a job vacancy is:

- 1) the jobseeker's name and contact information, native language, other language skills and nationality;
- 2) the jobseeker's education status and vocational qualifications, as well as the content and grades thereof where necessary;
- 3) work history and the information provided in the work certificate;
- 4) the performance of military service;
- 5) special skills, work and education wishes, as well as the jobseeker's own job-seeking presentation for employers;
- 6) the information that the person has been an unemployed jobseeker for the past 12 consecutive months, as required for fulfilling the requirement for concluding a fixed-term employment agreement in accordance with chapter 1, section 3a of the Employment Contracts Act and chapter 1, section 4a of the Seafarers' Employment Contracts Act.

Information related to a jobseeker's state of health may only be disclosed to an employer if the jobseeker gives their individualised written consent and the information is necessary for filling a job vacancy or fulfilling the specific health requirements of the field of profession in question or promoting the employment of a jobseeker whose disability or illness hinders their employment.

An employer also has the right to know whether a former employee specified by the employer is registered as a jobseeker with the employment authority when fulfilling the re-employment obligation set in the Employment Contracts Act.

Published job applicant profiles can be searched for and viewed by employers who have logged in to the service platform.

In order to fulfil the employment obligation to the municipality that the

employment obligation applies to in accordance with section 108 of the Act on the Organisation of Employment Services, the employment authority must disclose the grounds for the obligation and the information on the person to be employed related to their education and work experience and other information necessary for employment as specified in subsections 2 and 3.

Employment authorities, the Social Insurance Institution of Finland, unemployment funds and foreign institutions authorised to process tasks related to a person's jobseeking and unemployment security have the right to mutually exchange information related to jobseeking and unemployment security that has an impact on the person's right to receive unemployment benefits (chapter 11, section 4b and chapter 13, section 1, subsection 3 of the Unemployment Security Act, Act on the Application of European Union Legislation Concerning the Coordination of Social Security Systems).

Your personal data may also be disclosed to a provider of employment services and a provider of employment support services specified in your employment plan or a corresponding plan if the data are necessary for the production and provision of the service. However, any information on the client's state of health may be disclosed to a service provider only if the client gives their individualised written consent for the disclosure of the information (section 116, subsection 4 of the Act on the Organisation of Employment Services).

Some client data have been ordered to be retained permanently by the National Archives of Finland in accordance with the Archives Act (831/1994). The data ordered to be retained permanently are transferred to the National Archives after they have been removed from the client information system.

We may disclose your personal data to other authorities if the disclosure is prescribed by law or you have given your consent for the disclosure. The content of the information to be disclosed is determined based on the right of access to the information of the authority requesting the information.

Processors of the personal data

The City may outsource the processing of your personal data to an external system supplier or service provider based on a separate commission agreement. In that case, the personal data are processed on behalf of the City and to fulfil a purpose determined by the City. The City remains the data controller of your personal data. The City and the service provider are jointly responsible for the appropriate processing of your personal data.

Are your personal data transferred outside of the EU or EEA?

By default, the City of Helsinki ensures that your personal data are processed within the EU or the EEA. However, in some cases, the City's services or functions may also be carried out by service providers, services or servers located elsewhere. In such cases, your personal data may also be transferred outside the EU or the EEA, such as to the United States. The General Data Protection Regulation sets strict criteria for transferring personal data to countries whose legislation concerning the processing of personal data deviates from the requirements of European data protection legislation. In such cases, the City of Helsinki commits to adhering to the requirements set for an adequate level of personal data protection and, where applicable, commits its system suppliers and service providers to adhering to similar data protection obligations, as prescribed in data protection legislation.

How long do we retain your data?

In accordance with section 122 of the Act on the Organisation of Employment Services, all data on clients and service providers are deleted from the national database after four years from the end of the client relationship or contractual relationship. However, the data will not be deleted if they are necessary for performing a task based on regulations or due to a pending matter.

Recordings of phone conversations between personal clients and the advisory service are deleted six months after their recording.

The data in the job applicant profile database are deleted when the data subject deletes their job applicant profile from the service platform, but no later

than one year after the data subject's last login to the service platform. The above does not apply to a jobseeker while their job search is active. Once a jobseeker's job search has ended, the data in the job applicant profile database are deleted when the data subject deletes their job applicant profile from the service platform, but no later than one year after the data subject's last login to the service platform.

Some client data have been ordered to be retained permanently by the National Archives of Finland in accordance with the Archives Act (831/1994). The data ordered to be retained permanently are transferred to the National Archives after they have been removed from the client information system. The KEHA Centre is responsible for removing the documents entered into the aforementioned system and documents submitted via the E-services.

The City of Helsinki is the independent creator of archives insofar as the information in question is not contained in the aforementioned systems or documents submitted via them. In accordance with the Archives Act, the City is responsible for archiving the documents that it receives and generates while carrying out its tasks. Documents received and generated by the City are processed and archived in accordance with the City's data management plan.

Automated decision-making and profiling

We do not use your data for automated decision-making.

The service platform referred to in section 120 of the Act on the Organisation of Employment Services utilises a feature that improves the matching of job applicant profiles and job vacancies by making use of profiling, but decisions are not made solely on the basis of profiling.

Your rights regarding the processing of your personal data

Information on the rights of data subjects and instructions for exercising these rights are available at:

<https://www.hel.fi/en/decision-making/information-on-helsinki/data-protection-and-information-management/data-protection/rights-of-data-subjects-and-exercising-these-rights>

Right of access (Article 15)

You have the right to obtain confirmation as to what personal data concerning you are being processed and what data concerning you have been stored. The City of Helsinki will provide you with the information without undue delay, at the latest within one month of receiving the request. If necessary, this deadline may be extended by a maximum of two months if the request is of exceptional scope and complexity. If the deadline is extended, the City will notify the person who submitted the request of the extension and the grounds for the extension within one month of receiving the request.

Right to rectification (Article 16)

You have the right to request that the City rectify inaccurate personal data concerning you without undue delay. You also have the right to have incomplete data completed. Whether the data are incomplete will be determined based on the purpose of the processing of the personal data. If the City rejects your request for rectification, it will issue a written certificate stating the reasons why the request was rejected. You will also be informed of the possibility of lodging a complaint with the supervisory authority and of judicial remedies.

Right to be forgotten (Article 17)

The right to erasure does not apply if the processing is necessary for compliance with a legal obligation to which the City is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the City. In some exceptional cases, e.g. if the processing has been based on your consent and you withdraw your consent, you have the right to have your personal data erased, i.e. to be forgotten. If the City rejects your request for erasure, it will issue a written certificate stating the reasons why the request was rejected. You

will also be informed of the possibility of lodging a complaint with the supervisory authority and of judicial remedies.

Right to restriction of processing (Article 18)

Legislation pertaining to public employment services limits a personal client's right to restriction of processing. A registered personal client does not have the right to restrict the processing of the data in the register in accordance with Article 18. The limitation in question is a limitation of the data subject's rights set separately through legislative procedures in accordance with Article 23. In other respects, the data subject's rights are applied normally.

Right to data portability (Article 20)

The right to data portability does not apply when the processing is based on a public obligation. For this reason, this right does not apply to processing necessary for the fulfilment of a statutory obligation, the performance of a task carried out in the public interest or in the exercise of official authority vested in the City. The right to data portability pertains to situations in which the data subject has provided the data controller with their personal data and the processing of the data is based on consent or an agreement and the processing is carried out automatically.

Right to object (Article 21)

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you when the processing is based on the performance of a task carried out in the public interest or in the exercise of official authority vested in the City. In this case, the data can continue to be processed only if the City demonstrates compelling legitimate grounds for the processing. The processing may also continue if the processing is necessary for the establishment, exercise or defence of legal claims. The right to object does not exist when personal data are processed based on other grounds, such as the fulfilment of a statutory obligation.

Right to lodge a complaint with a supervisory authority (Article 77)

You have the right to lodge a complaint with a supervisory authority if you consider the processing of personal data concerning you to infringe the EU General Data Protection Regulation ((EU) 2016/679). In addition to this, you have the right to exercise other administrative and judicial remedies.

[Office of the Data Protection Ombudsman](#)

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How can you contact us for questions related to data protection?

In matters related to data protection, please contact the Helsinki Employment Services' lawyer (Employment Services Enterprise).

Person in charge

Employment Services Enterprise/Managing Director.

In accordance with section 6 of the decision by the Employment Services Enterprise on the responsibilities and tasks of the data controller (2 January 2025), the person in charge of the register is the Managing Director.

Contact details

City of Helsinki

Contact details

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Visiting address: Pohjoisesplanadi 11–13

Telephone: +358 9 310 13700

The opening hours of the Register Office are Monday to Friday 8.15–16.00.

KEHA Centre: tietosuoja.keha@ely-keskus.fi

Contact details of the Data Protection Officer

Data Protection Officer of the City of Helsinki

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+358 9 310 1691 (switchboard)

This privacy notice was updated on 23 September 2026.